

SITE ASSESSMENT REPORT FOR

12.1-98

TILTON PLATING

TILTON, VERMILION COUNTY, ILLINOIS

TDD No.: S05-9809-012 PAN: 8P1201SIXX

December 1, 1998

Prepared for:
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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1. Introduction

The United States Environmental Protection Agency (U.S. EPA) tasked the Ecology and Environment, Inc. (E & E), Superfund Technical Assessment and Response Team (START) to perform a site assessment at the Tilton Plating site in Tilton, Illinois. START was requested under Technical Direction Document (TDD) S05-9809-012 to obtain and review background information, conduct a site visit, document site conditions with written and visual documentation, make recommendations to U.S. EPA based on site assessment data collected, determine site characteristics, determine pollutant dispersal pathways, develop a health and safety plan, conduct sampling activities, and perform air monitoring. All site activities were coordinated under the authority of the U.S. EPA On-Scene Coordinator (OSC) Cindy Nolan.

2. Site Background

2.1 Site Description

The Tilton Plating site is a defunct plating facility located at 305 Fairfield Street, Tilton, Vermilion County, Illinois, latitude 40°6′12″N and longitude 87°38′44″W (Figure 2-1). The 0.5-acre site is situated in a residential area and consists of a 40-foot by 40-foot building and surrounding land. The site is bordered by a residence to the south, Fairfield Street to the north and east, and a railroad to the west (Figure 2-2). There is a small brick building on the southern side of the building, which belongs to the resident to the south. Residences are also located across Fairfield Street to the north and to the southeast.

2.2 Site History

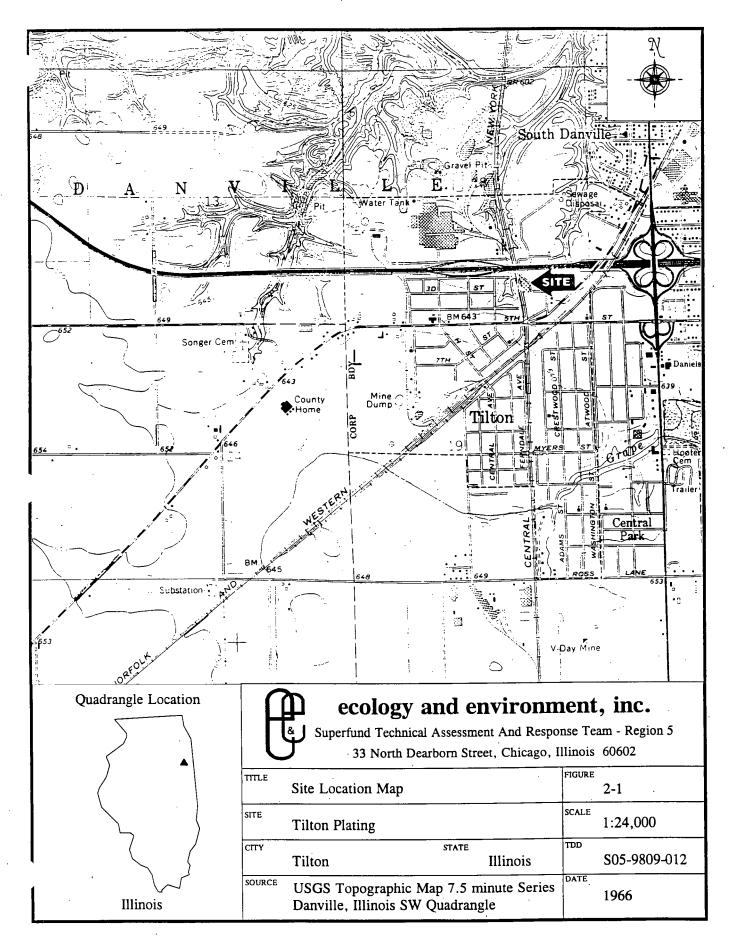
The years of operation of the Tilton Plating site is unknown. Water violations for the site date back to 1992. Tilton Plating was incorporated on January 24, 1994, and was involuntarily dissolved on June 1, 1995. During the START site assessment, a neighbor told START that the site operated for approximately 25 years. The Illinois Environmental Protection Agency (IEPA) has site maps dating back to 1975. These maps depict buildings on site, but whether the site operated as a plating facility at that time is not known. The current owner of the site property is Dale Newmister. The past operator of the site was Bill McDonald.

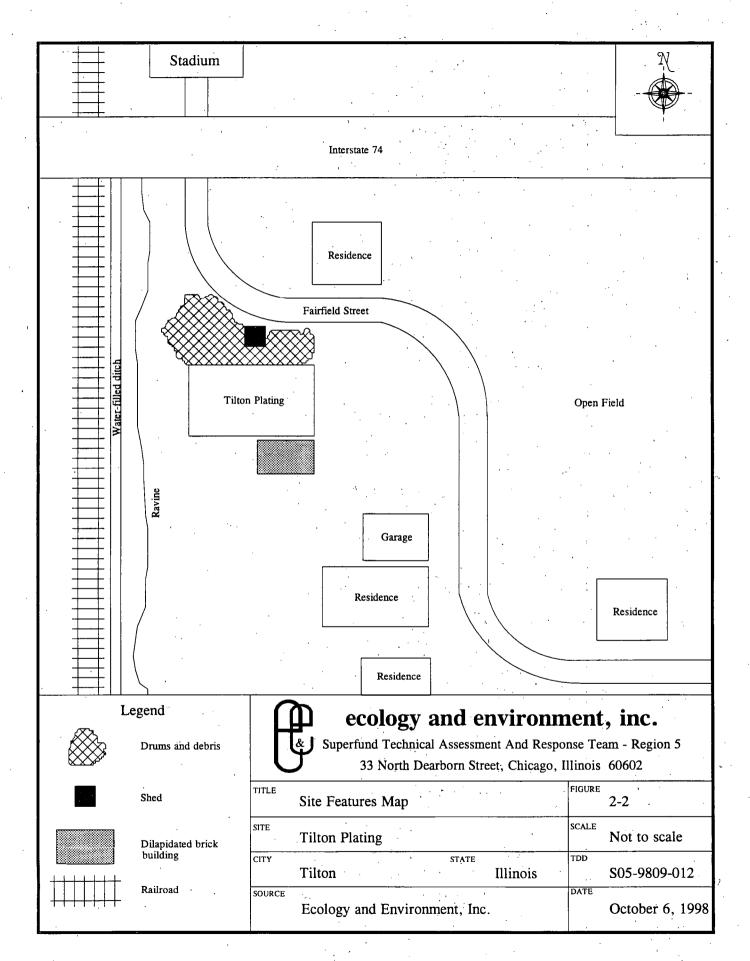
IEPA was first notified of the Tilton Plating site in 1992, when a neighbor to the south of the site informed IEPA of their dog dying. An autopsy, dated October 29, 1992, was performed on the dog and revealed heavy metals in the blood. Another dog in the neighborhood has also died since then.

On April 18, 1995, IEPA collected soil samples around the site with a drill rig. IEPA sample results indicated elevated levels of barium around the entire site, and east of the site across Fairfield Street, on residential property. Hazardous levels of lead, cadmium, and chromium were detected along

the western edge of the property.

On September 15, 1998, IEPA conducted a site investigation of Tilton Plating. During the investigation, IEPA inventoried chemical containers, collected soil samples, took x-ray fluorescence (XRF) readings of soil to determine metal content, and collected vat and drum samples which were later tested for pH with a pH meter. The pH readings ranged from 0 to 2.6. The soil, vat, and drum samples were sent to a laboratory for various analyses. These analyses were not received by IEPA at the time this report was prepared.





3. Site Assessment

The site assessment occurred on September 25, 1998. Present during the site assessment were U.S. EPA OSC Cindy Nolan, IEPA representatives Neelu Reddy and Mark Weber, and START members Bill Sass and Paul Atkociunas. START photodocumented and videotaped the exterior of the site (Attachment A). The southern exterior wall had a green-blue discoloration on the mortar and the western exterior wall had a yellow-brown discoloration. Several holes were observed in the southern wall. A ravine was observed west of the building. No vegetation was observed along the middle of the exterior western wall and down into the ravine. An exhaust vent is located at the top of the western wall. START observed yellow and brown discoloration on the wall below the vent, which may have been caused by chromic acid vented from the building. Numerous drums were observed on the exterior northern side of the building. The majority of the drums were composed of a poly material. Labels noted on the drums were "corrosive", "hydrochloric acid", "nitric acid", and "formaldehyde". The majority of the drums were labeled as acids. Several drums were observed outside the shed and several 5-gallon containers were observed inside the shed.

The building was entered and air monitoring was performed. No readings were detected above background on the cyanide monitor, the combustible gas indicator (CGI), which reads lower explosive limit (LEL) and oxygen, or the photoionization detector (PID). The north door on the eastern side of the building was not locked. A sample was collected from a small jar labeled "zinc cyanide" (Figure 3-1). The sample, which was field screened for cyanide using a Merck EM Quant Test Kit, tested positive for cyanide. START tested material from several containers for pH using pH paper. The pH ranged from <1 to 2.

During a second entry into the building, START photodocumented and videodocumented hazards present inside the building. An inventory was taken of hazardous materials in the building (Table 3-1). The northwestern corner of the building contained a storage area. East of the storage area was a

laboratory. There was evidence of the roof leaking in the building, as one vat was filled with rainwater. Three drains were observed in the floor of the building. One drain was believed to lead to a sewer; it is unknown where the other two drains lead. Soil was visible under one of the drains.

OSC Nolan initiated an emergency stabilization to secure the drums and building. That same day, Earth Tech, a contractor to U.S. EPA under the Emergency and Rapid Response Service (ERRS) contract, arrived on site, moved drums located outside the building to inside the building, and secured the site. One drum of acid, which was in very poor condition, was overpacked.

On September 26, 1998, START and U.S. EPA revisited the site to complete the inventory. The inventory indicated that nine vats, twenty-five 55-gallon drums, four 30-gallon drums, ten 20-gallon drums and carboys, and 32 miscellaneous small containers (5-gallon in size and smaller) were present at the site. Note that these numbers are estimates, as some containers could have been missed while completing the inventory.

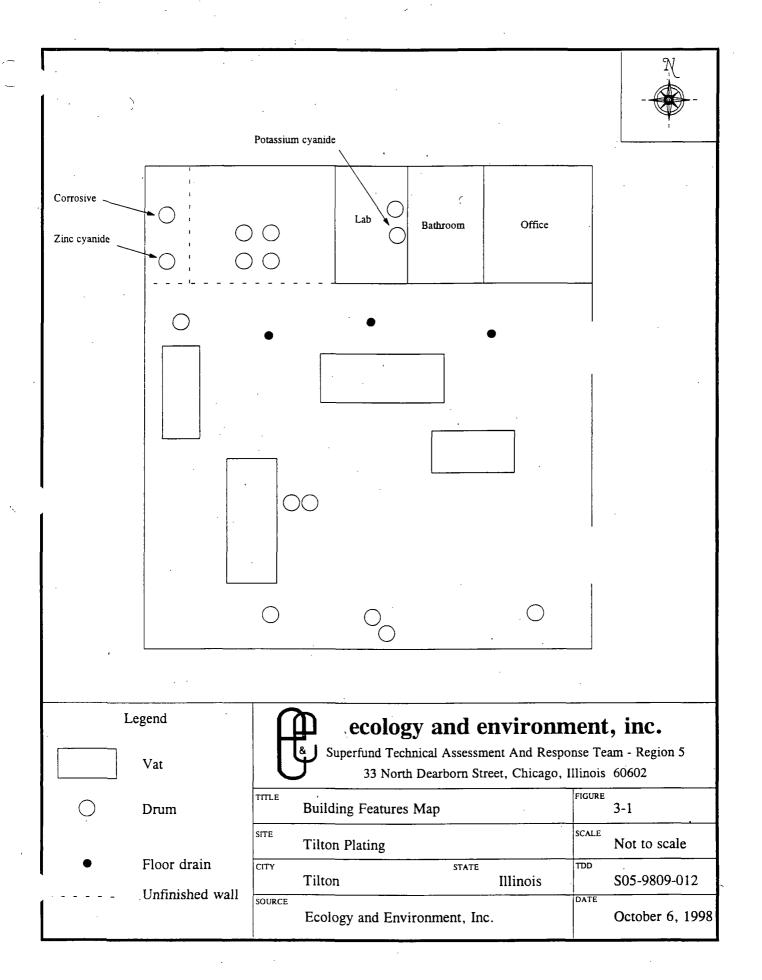


Table 3-1

CONTAINER/WASTE INVENTORY TILTON PLATING SEPTEMBER 25, 1998

Quantity	Description	Capacity/ container (gal.)	Amount/ container (gal.)
2	0.5 liter brown bottle - unknown liquid - no label	0.15	0.15
1	0.5-gal. container labeled "aqueous ammonia"	0.5	0.13
4	1-gal. container labeled "copper sulfate" (solid granular), 5 lbs each	1	1
1	1-gal. glass bottle labeled "ammonium hydroxide"	1	0.25
1	1-gal. container labeled "sulfuric acid"	1	0.4
1	1-gallon poly jug labeled "oxpho blue"	1	0.25
1	2-gal. metal container of unknown white powder	2	2
1	2-gal. container of granular potassium cyanide	2	1
I	20-gal. carboy labeled "nitric acid"	20	10
2	20-gal. poly carboy labeled "sulfuric acid"	20	15
2	20-gal. poly carboy labeled "hydrochloric acid"	20	20
1	20-gal. poly carboy wrapped in wood stakes containing acid	20	20
1	20-gal. container of unknown liquid, probably rainwater	20	20
1	20-gal. drum labeled "phosphoric acid"	20	20
2	20-gal. poly carboy containing unknown acids	20	10
1	20-gallon metal drum, contents unknown	20	10
i	250-gram (12-ounce volume) container of granular potash	0.1	0.05
1	30-gal. poly-lined fiber drum containing acid (was overpacked)	30	20
1	30-gallon metal container - no label, unknown liquid	30	8
1	30-gallon poly carboy - no label, unknown liquid	30	22
1	30-gallon drum labeled "copper solution"	30	15
2	5-gal. pail containing 6" sludge	5	2
3	5-gal. poly container labeled "black chromate"	5	5
1	5-gallon open-top bucket. labeled cleaning cmpd., non-DOT regulated	5	2.5
1	5-gallon bucket labeled "corrosive" and "iron phosphate"	5	2.5
I	5-gallon closed-top poly drum labeled."corrosive" nitric acid	5	0.5

Table 3-1

CONTAINER/WASTE INVENTORY TILTON PLATING SEPTEMBER 25, 1998

Quantity	Description	Capacity/ container (gal.)	Amount/ container, (gal.)
1	5-gallon bucket of unknown liquid	5	5
1,	5-gallon poly bucket labeled "iron phosphate"	5	5
1	55-gal. drum containing water, debris	55	55
1	55-gal. drum labeled "hydrochloric acid"	55	30
1 .	55-gal. drum labeled "formaldehyde"	55	30
3	55-gal, poly drums containing residue solids	55	2
2	55-gal, poly drum of unknown acid	55	55
7	55-gallon closed-top drum labeled "chromic acid and phosphate solution", assumed half acidic and half basic	385	385
2	acidic cleaner	5	5
2	automobile batteries	. 1	1
i	bottle of phosphoric acid	: 1	0.5
2	buckets containing unknown liquid, probably rainwater	. 5	5
5	empty poly drums	55	. 0
1	empty poly drums	30	0
1	garbage can containing bag labeled "boric acid"	12	10
1	laboratory reagent bottle - liquid - no label	0.1	0.1
1	paint can of paint remover	0.25	0.25
1	salvage drum, contents unknown	85	55
1	small container of white granular solid - no label	0.15	0.15
1	stainless steel drum labeled "nitric acid"	55	25
1	steel container full of sludge	10	10
1	steel tub containing 6" sludge	30	15
1	trash can containing 10" sludge	15	5
1	vat containing white crystalline solid - clumped (8' x 3' x 3')	500	20
i	vat containing 6" green liquid (8' x 3' x 3')	500	100

Table 3-1

CONTAINER/WASTE INVENTORY TILTON PLATING SEPTEMBER 25, 1998

Quantity	Description	Capacity/ container (gal.)	Amount/ container (gal.)
· 1	vat containing unknown liquid (4' x 3' x 4')	350	10
1	vat containing 1' blue liquid (3' x 3' x 4')	250	60
1	vat containing unknown liquid (3' x 3' x 4')	250	20
1	vat labeled "black oxide" (3' x 3' x 4')	250	30
I	vat full of clear liquid (possibly rainwater)	700	700
1	vat labeled "black oxide" (8' x 3' x 3')	500	250
1	vat containing unknown liquid (4' x 3' x 4')	350	10

Key: gal. = gallon

4. Analytical Results

No samples were sent to a laboratory for analysis during this site assessment. Field tests for pH indicated that the corrosive drums were acidic and that containers labeled "zinc cyanide" did contain cyanide.

5. Discussion of Potential Threats

Section 300.415, paragraph (b)(2) of the National Contingency Plan (NCP) lists factors to be considered when determining the appropriateness of a potential removal action at a site. Specifically, the following is a discussion of the applicable conditions which exist at the Tilton Plating site:

- Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants. Acids, caustics, poisonous substances (cyanides), and heavy metals were found both inside the building and outside the building. Tilton Plating is located in a residential neighborhood. This situation makes it an attractive nuisance to people, children, and animals. The neighbor to the south of the site claims his dog died as a result of exposure to heavy metals detected in the animal's blood.
- Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release. A number of the hazardous materials found were contained in drums and vats. A vat inside the building was filled with rainwater from a leaky, deteriorating roof. If not removed, these hazardous substances have the potential to leak onto the floor and overflow, or the roof could collapse and break the deteriorating drums. The materials could then migrate to the drains in the floor and soak into the soil.
- High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate. IEPA found hazardous levels of heavy metals in the soil both on site and at a nearby residence across the street, indicating that contaminants have begun migrating off the property. Heavy rains may cause further migration of contaminants. Winds could cause dust particulates containing heavy metals to migrate.
- Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released. As stated above, rainwater could cause vats and open drums to overflow, the roof to collapse, and contaminated soils to migrate. Winds can cause dust particulates to migrate. A heavy storm could cause further damage to the roof of the building.

6. Removal Actions/Cost Estimate

Conditions observed at the Tilton Plating site during the site assessment demonstrate appropriate criteria for warranting the initiation of a removal action. Hazardous materials stored in drums, tanks, vats, and other containers, and possibly soil, pose an imminent public health threat to nearby residents. A removal action at the Tilton Plating site would include three major phases: 1) site stabilization; 2) hazardous waste removal and a soil extent of contamination (EOC) study; and 3) building demolition, and excavation and disposal of contaminated soil. An estimate of costs for conducting a removal action at the Tilton Plating site, totaling approximately \$496,000, was prepared using the Removal Cost Management System (RCMS) Cost Projection Module, version 4.2 (Appendix B).

The knowledge of container contents and degree of soil contamination at the Tilton Plating site are limited to IEPA studies, which included XRF readings and pH readings, and U.S. EPA and START observations and field screening conducted during a site visit on September 25 and 26, 1998.

Analytical data from IEPA was not available at the time this report was prepared. This situation makes it necessary to base the removal cost estimate on certain assumptions. Those assumptions are as follows:

- Cleanup contractor rates are those of the ERRS contractor.
- Phase 1 of the removal action will include mobilizing the ERRS contractor to stabilize the site, which will include moving all drums and other containers into the building, and replacing locks and doors on the building. This phase is estimated to take one working day.
- Phase 2 will include mobilization of personnel and equipment, container sampling, compatibility and bulk testing, waste consolidation, disposal bidding, demolition of the building, and disposal of building debris. This phase is estimated to take 30 working days.
- Phase 3 will include an EOC study, excavation of contaminated soil, and

transportation and disposal of excavated soil. A total of 20 working days will be required for this phase.

- e ERRS contractor personnel for Phase 1 will include one supervisor and one laborer; and for Phases 2 and 3 will consist of one supervisor, one field clerk, one foreman/equipment operator, and three laborers. The START contractor personnel will include one environmental scientist for the entire project and one additional environmental scientist to assist with sampling and hazcatting for 10 days. One U.S. EPA OSC will be on site at all times.
- Security guards will be hired to secure equipment during non-working hours of active phases. Guards will not be provided during demobilization periods.
- Volumes of containerized wastes were based upon U.S. EPA and START inventories (Table 3-1) and field screening data.
- Wastestreams will include acidic liquids (400 gallons = 8 drums), base/neutral liquids (1,100 gallons), base/cyanide sludge (200 gallons = 4 drums), nickel liquids (100 gallons = 2 drums), copper liquids (75 gallons = 2 drums), chromate liquids (400 gallons = 8 drums), cyanide solids (2 gallons), miscellaneous solids with metals (50 gallons = 1 drum), hazardous debris (20 cubic yards), building debris (178 cubic yards), hazardous metal-contaminated soil (300 tons), and nonhazardous metal-contaminated soil (150 tons).
- All waste streams will be shipped to off-site facilities for disposal. The acidic liquids, base/neutral liquids, base/cyanide sludge, nickel liquids, copper liquids, chromate liquids, miscellaneous solids with metals, hazardous debris, and hazardous metal-contaminated soil will be shipped to the Environmental Quality (EQ) Company near Detroit, Michigan, for treatment and disposal. The nonhazardous metal-contaminated soil, nonhazardous debris, and building debris wastestreams will be disposed of at the local Brickyard Disposal landfill. The 2 gallons of cyanide solids will be shipped to an incinerator for disposal.
- Soil volumes assume excavation of the top 6 inches of soil, 40 feet in all directions from the building, with excavation of 2 feet of soil behind the building and under a portion of the floor. Of the estimated 450 tons (approximately 350 cubic yards) of soil, approximately 150 tons are assumed to be nonhazardous (special waste). The remaining 300 tons will require treatment for leachable metals.
- The hazardous debris wastestream is assumed to be comprised of wood, paper, and other porous materials that cannot be decontaminated. This wastestream will be shipped to EQ for microencapsulation. Nonhazardous debris is assumed to be comprised of metal, plastic, and other materials which can readily be decontaminated.

The building debris is assumed to be nonhazardous. The volume estimate of 178 cubic yards of building debris was estimated using the volume of the building (40 feet by 40 feet by 10 feet high) multiplied by a factor of 0.3.

Table 6-1

WASTESTREAM SUMMARY TILTON PLATING TILTON ILLINOIS

Wastestream	Quantity	Unit Cost	Disposal Method	Disposal Location
Acidic liquids	8 drums	\$150	Treatment	EQ - MI
Base/cyanide sludge	4 drums	\$80	Treatment	EQ - MI
Base/neutral liquids	1,100 gallons	\$1	Treatment	EQ - MI
Building debris	178 cubic yards	\$15	Landfill	Brickyard Disposal, IL
Chromate liquids	8 drums	\$150	Treatment	EQ - MI
Copper liquids	2 drums	\$70	Treatment	EQ - MI
Cyanide solids	2 gallons	\$150	Incineration	TWI - IL
Hazardous debris	20 cubic yards	\$140	Microencapsulation	EQ - MI
Hazardous soil	300 tons	\$105	Treatment	EQ - MI
Miscellaneous solids with metals	1 drum	\$70	Treatment	EQ - MI
Nickel Iquids	2 drums	\$70	Treatment	EQ - MI
Nonhazardous debris	20 cubic yards	\$15	Landfill	Brickyard Disposal, IL
Nonhazardous soil	150 tons	\$15	Landfill	Brickyard Disposal, IL

7. Conclusion

The contaminants discovered during this site assessment in drums, vats, and containers have the potential to affect human health and the environment and should be removed. Discoloration of the exterior walls of the building demonstrate migration of metal contaminants, supporting XRF data from IEPA which indicated elevated levels of heavy metals in the soil. Also, the soil underneath the building is most likely contaminated and should also be removed following demolition of the building.

Appendix A

Site Photodocumentation



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1045
LOCATION: Tilton, Illinois DIRECTION: West PHOTOGRAPHER: Bill Sass
SUBJECT: Front of building, brick building owned by resident, and shed (at far right).



SITE: Tilton Plating
LOCATION: Tilton, Illinois

DATE: September 25, 1998
DIRECTION: South
PHOTOGRAPHER: Bill Sass

SUBJECT: Residence located south of Tilton Plating, viewed from the driveway of the site.



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1045
LOCATION: Tilton, Illinois DIRECTION: North PHOTOGRAPHER: Bill Sass
SUBJECT: Residence located across Fairfield Street north of the site, viewed from the driveway of the site.



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1046

LOCATION: Tilton, Illinois DIRECTION: West PHOTOGRAPHER: Bill Sass

SUBJECT: Drums north of building.



SITE: Tilton Plating DATE: September 25, 1998
LOCATION: Tilton, Illinois DIRECTION: West
SUBJECT: Containers in small shed.

TIME: 1046 PHOTOGRAPHER: Bill Sass



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1046
LOCATION: Tilton, Illinois DIRECTION: North PHOTOGRAPHER: Bill Sass
SUBJECT: Close-up of drum on north side of building. Drum is labeled "Muriatic Acid".



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1047
LOCATION: Tilton, Illinois DIRECTION: North PHOTOGRAPHER: Bill Sass
SUBJECT: Close-up of drum on north side of building. Drum is labeled "Formaldehyde".



DATE: September 25, 1998 **TIME:** 1047 SITE: Tilton Plating

LOCATION: Tilton, Illinois DIRECTION: North PHOTOGRAPHER: Bill Sa SUBJECT: Close-up of container on north side of building. Container is labeled PHOTOGRAPHER: Bill Sass

"Phosphoric Acid".



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1047

LOCATION: Tilton, Illinois DIRECTION: North PHOTOGRAPHER: Bill Sass

SUBJECT: Close-up of container on north side of building labeled "Muriatic Acid".



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1048
LOCATION: Tilton, Illinois DIRECTION: Northwest PHOTOGRAPHE
SUBJECT: Steel drum on north side of building.

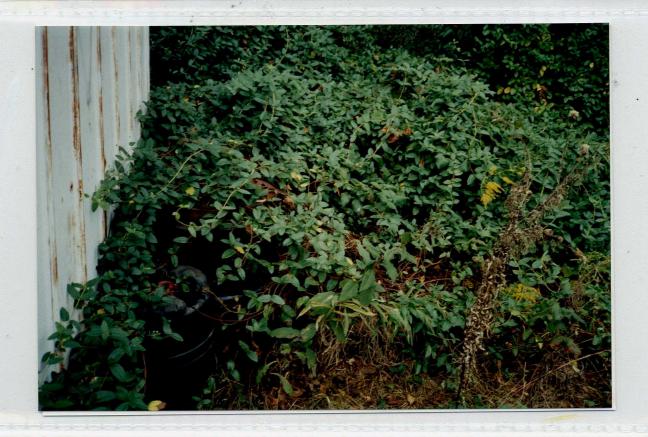
TIME: 1048
PHOTOGRAPHER: Bill Sass



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1049
LOCATION: Tilton, Illinois DIRECTION: North PHOTOGRAPHER: Bill Sass
SUBJECT: Drums hidden by foliage on north side of building.



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1050
LOCATION: Tilton, Illinois DIRECTION: North PHOTOGRAPHER: Bill Sass
SUBJECT: Drums hidden by foliage on north side of building.



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1050 LOCATION: Tilton, Illinois DIRECTION: West PHOTOGRAPHER: Bill Sass SUBJECT: Drums and containers on north side of building.



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1052
LOCATION: Tilton, Illinois DIRECTION: East PHOTOGRAPHER: Bill Sass
SUBJECT: Hole in wall of building with yellow stain visible in brick mortar.



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1053
LOCATION: Tilton, Illinois DIRECTION: North PHOTOGRAPHER: Bill Sass
SUBJECT: South wall of building.



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1054
LOCATION: Tilton, Illinois DIRECTION: East PHOTOGRAPHER: Bill Sass
SUBJECT: West wall of building.



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1054
LOCATION: Tilton, Illinois DIRECTION: East PHOTOGRAPHER: Bill Sass
SUBJECT: Close-up of possible leakage point along west wall.



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1055
LOCATION: Tilton, Illinois DIRECTION: West PHOTOGRAPHER: Bill Sass
SUBJECT: Sparsley vegetated drop-off to ravine on west side of building.



SITE: Tilton Plating DATE: September 25, 1998

LOCATION: Tilton, Illinois DIRECTION: West

SUBJECT: Vat filled with liquid in building.

PHOTOGRAPHER: P.Atkociunas



SITE: Tilton Plating

DATE: September 25, 1998

LOCATION: Tilton, Illinois

DIRECTION: Southwest

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Two open containers in building. One contains boric acid (right) and the other contains an unknown solid.



SITE: Tilton Plating

DATE: September 25, 1998

LOCATION: Tilton, Illinois DIRECTION: West
SUBJECT: Floor of building with blue and yellow staining.

TIME: 1205

PHOTOGRAPHER: P. Atkociunas



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1206
LOCATION: Tilton, Illinois DIRECTION: West PHOTOGRAPHER:
SUBJECT: Green liquid in vat.

PHOTOGRAPHER: P. Atkociunas



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1207
LOCATION: Tilton, Illinois DIRECTION: West PHOTOGRAPHER: P. Atkociunas
SUBJECT: Drums inside building.



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1208
LOCATION: Tilton, Illinois DIRECTION: East PHOTOGRAPHER: P. Atkociunas
SUBJECT: Jar labeled "Potassium Cyanide".



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1208
LOCATION: Tilton, Illinois DIRECTION: East PHOTOGRAPHER: P. Atkociunas
SUBJECT: Containers inside building. One is labeled "Copper Sulfate".



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1208
LOCATION: Tilton, Illinois DIRECTION: West PHOTOGRAPHER: P. Atkociunas SUBJECT: Chemicals in the laboratory.



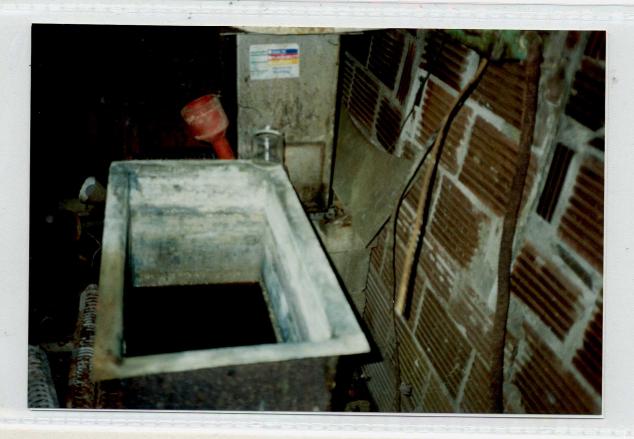
SITE: Tilton Plating DATE: September 25, 1998 TIME: 1210
LOCATION: Tilton, Illinois DIRECTION: Down PHOTOGRAPHER: P. Atkociunas
SUBJECT: Blue staining of building floor.



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1211

LOCATION: Tilton, Illinois DIRECTION: West PHOTOGRAPHER: P. Atkociunas

SUBJECT: Containers. One is labeled "Zinc Cyanide", which field-tested positive for cyanide, and another is labeled "Corrosive".



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1212
LOCATION: Tilton, Illinois DIRECTION: South PHOTOGRAPHER: P. Atkociunas
SUBJECT: Inside a vat.



SITE: Tilton Plating DATE: September 25, 1998 TIME: 1213
LOCATION: Tilton, Illinois DIRECTION: West PHOTOGRAPHER: P. Atkociunas SITE: Tilton Plating

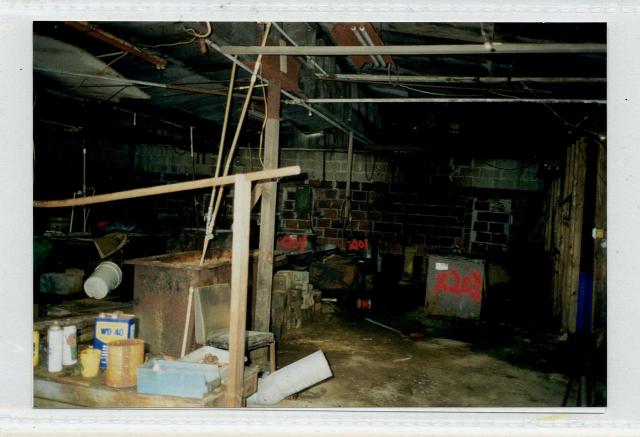


SITE: Tilton Plating DATE: September 25, 1998 TIME: 1213
LOCATION: Tilton, Illinois DIRECTION: South PHOTOGRAPHER: P. Atkociunas
SUBJECT: Debris and solid material inside a vat.

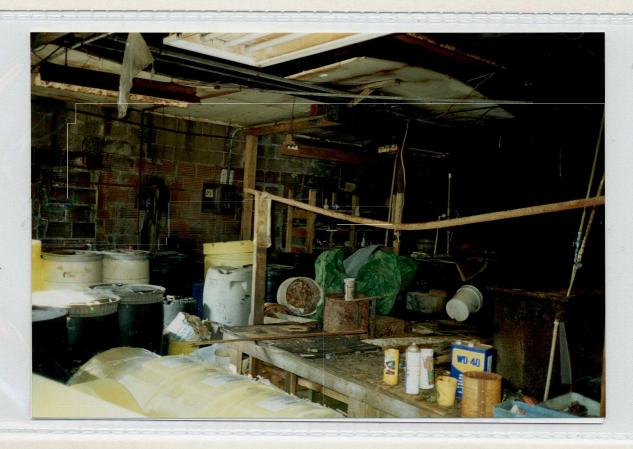


SITE: Tilton Plating DATE: September 25, 1998 TIME: 1214

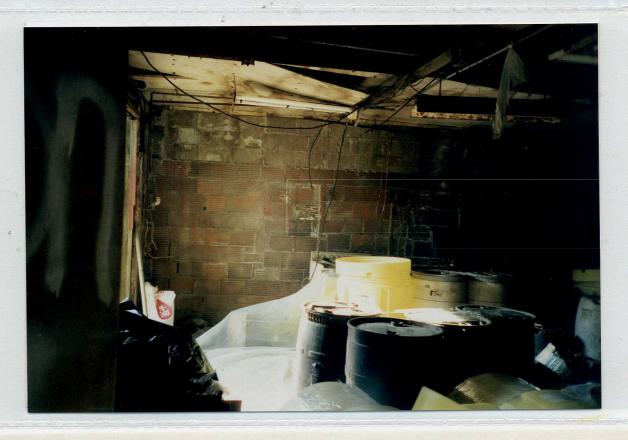
LOCATION: Tilton, Illinois DIRECTION: Down PHOTOGRAPHER: P. Atkociunas SUBJECT: Drain in floor, showing exposed soil underneath building.



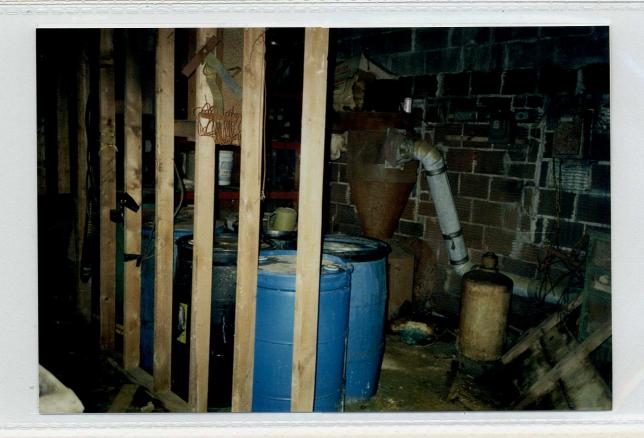
SITE: Tilton Plating DATE: September 26, 1998 TIME: 0930 DIRECTION: West PHOTOGRAPHER SUBJECT: View inside plating shop. PHOTOGRAPHER: P. Atkociunas



SITE: Tilton Plating DATE: September 26, 1998 TIME: 0930 PHOTOGRAPHER: P. Atkociunas SUBJECT: Inside building.



SITE: Tilton Plating DATE: September 26, 1998 TIME: 0930 LOCATION: Tilton, Illinois DIRECTION: South PHOTOGRAPHER: P. Atkociunas SUBJECT: Drums inside building.



SITE: Tilton Plating DATE: September 26, 1998 TIME: 0930 PHOTOGRAPHER: P. Atkociunas SUBJECT: Drums in building.



SITE: Tilton Plating DATE: September LOCATION: Tilton, Illinois DIRECTION: Down SUBJECT: Drain in floor.

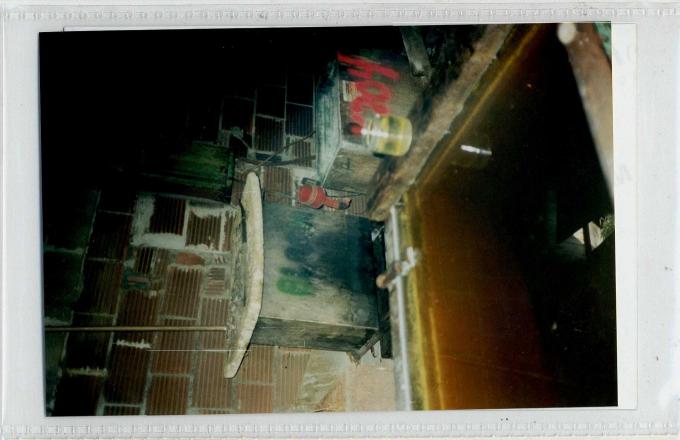
DATE: September 26, 1998 TIME: 0932
DIRECTION: Down PHOTOGRAPHER: P. Atkociunas



TIME: 0933

PHOTOGRAPHER: P. Atkociunas

SITE: Tilton Plating DATE: September 26, 1998 LOCATION: Tilton, Illinois DIRECTION: West SUBJECT: Drums and other containers staged in building by ERRS.



SITE: Tilton Plating LOCATION: Tilton, Illinois

SUBJECT: Vats.

DATE: September 26, 1998
DIRECTION: Northwest

TIME: 0933

PHOTOGRAPHER: P. Atkociunas

Appendix B

RCMS Cost Projection

6 PAGES REMOVED NON-RESPONSIVE